



ORIGINAL

Ben G. Almond • Vice President, Regulatory Affairs • phone 202.419.3020 • fax 202.419.3047

February 9, 2004

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room TW-A325  
Washington, DC 20554

RECEIVED

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

RE: Telephone Number Portability, CC Docket 95-116 and  
Numbering Resource Optimization, CC Docket 99-200  
**EX PARTE**

Dear Ms. Dortch:

This is to inform you that on February 2, 2004 the undersigned met with Jared Carlson and Jennifer Salhus, both in the Spectrum and Competition Policy Division of the Wireless Telecommunications Bureau concerning the referenced proceedings. The discussions centered on the development and implementation of a standard list for determining which counties/rate centers to associate with the largest Metropolitan Statistical Areas (MSA) for the purposes of establishing/clarifying carriers' obligations on wireless local number portability. It is anticipated that the North American Numbering Council (NANC) will soon recommend a standard MSA list for consideration by the FCC.

Cingular Wireless appreciates the current initiatives underway to improve the LNP process, including the aforementioned NANC activity for establishment of an industry standard MSA list for wireless local number portability. However, Cingular urges that the effective compliance date for any list adopted by the Commission not occur until after May 24, 2004. Although the adoption of a standard MSA list by all carriers ultimately would reduce some confusion and delay in the porting process, Cingular maintains that carriers should immediately focus their efforts on other issues that are bigger contributors to the confusion and delay that often occurs. For example, carriers must first resolve more critical IT protocol issues in order to mitigate major delays being experienced particularly on wireline to wireless porting requests. Any requirement to immediately implement a standard MSA list would divert critical carrier time and resources from resolving more substantial causes of delay in the porting process. Indeed, the immediate implementation of a standard MSA list is likely to add to the delay and confusion in the process at least during the implementation period.

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Please associate this notification and information with the referenced docket proceeding. If there are any questions concerning this matter, please contact the undersigned.

Sincerely,

A handwritten signature in black ink that reads "Ben G. Almond". The signature is written in a cursive style with a large, stylized "B" and "A".

Ben G. Almond  
Vice President-Federal Regulatory

Cc: Jared Carlson  
Jennifer Salhus